

Exhibit 15

Corporate Compliance Quarterly Report to Board of Directors 4Q08

**February 5, 2009
Bert Weinstein
Vice President, Corporate Compliance**





Agenda

- Purdue's CIA
 - Reportable Event
 - OIG Communications
 - IRO Reviews
 - Other Investigations
 - Monitoring
- Recent Developments in Compliance
- Federal/State Reporting
- Hotline, Other Inquiries, and Investigations
- National Sales Meeting
- Compliance Results -Purdue's Culture Survey



CIA - Reportable Event



- In the course of the regular monthly word-search review of call note database, the following note was found (highlighting added):

“...shared the conversion chart focusing on the oxycontin new strengths. discussed the flexibility it provides now with the many options. agreed. also reinforce that with this at q12h, this means better patient compliance, fewer pills, less chance of abuse. also left Senokot and Colace samples and reinforced the diff.”
(9/8/08 call note)

- Five call notes from the same representative contained similar statements
- District Manager also noted improper statement during call note review; reported it on a Field Contact Report for the representative
- During broadened Corporate Compliance investigation, similar errors noted in call notes of three additional representatives, by two reps in training sessions, and through other anecdotal evidence



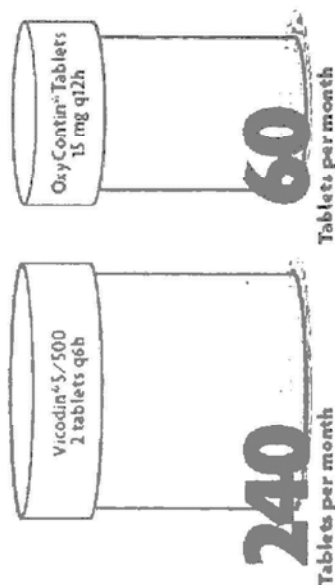
February '08 OxyContin Visual Aid



For moderate to severe pain when a continuous, around-the-clock (ATC) analgesic is needed for an extended period of time

Use fewer tablets monthly than with immediate-release opioids taken ATC

Compare the monthly reduction in tablets of q12h pain management with OxyContin® vs ATC immediate-release opioids



Q12h dosing with as few as 2 tablets per day

- OxyContin[®] is dosed less frequently than ATC immediate-release opioids
- OxyContin[®] is NOT intended for use as a pain analgesic, or for pain that is mild, or not expected to persist for an extended period of time

IMPORTANT SAFETY INFORMATION:

OxyContin[®] is an opioid agonist and a Schedule II controlled substance with an abuse liability similar to morphine.

Oxycodone can be abused in a manner similar to other opioid agonists, legal or illicit. This should be considered when prescribing or dispensing OxyContin[®] in situations where the physician or pharmacist is concerned about an increased risk of misuse, abuse, or diversion.

⁶ Please read accompanying professional prescribing information.
Please see boxed warning on page 2.



Investigative and Corrective Steps



- **Many Remedial Actions Have Been Implemented, including:**
 - **Communication cascade: W. Fisher to RDs, DMs, Reps**
 - **Bulletin to the field**
 - **January National Sales Meeting speeches (R. Gasdia, J. Stewart), and three workshops**
- **Letters from Medical Services to the five HCPs identified in original call notes**
- **Disclosure of Reportable Event to OIG on December 23rd**
- **Reviewed this matter and complete Disclosure Log with outside counsel**
- **Replacement of Visual Aid on January 21st - has strong cautionary statements regarding abuse**



January 21, 2009 OxyContin Visual Aid

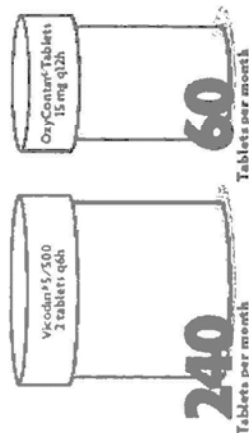


For moderate to severe pain when a continuous, around-the-clock (ATC) analgesic is needed for an extended period of time

Assuming the total daily dose of opioids* are the same for a patient...

* Using opioid conversion estimates

Consider the monthly reduction in tablets when prescribing OxyContin® Tablets q12h versus immediate-release opioids q4h–q6h ATC, for appropriate patients



This image is not intended to imply, and should not be interpreted as implying, that fewer tablets dispensed will result in less abuse, addiction, diversion or any other serious risk of opioid therapy.

- Although patients may receive fewer tablets in their prescription, each of those tablets contains a significantly larger amount of opioid than an immediate release opioid analgesic.
- While OxyContin® Tablets may be more convenient for your patient, with every 12 hour dosing there is still a significant potential for abuse and diversion of OxyContin® that should be considered in your prescribing decisions.

Q12h dosing with as few as 2 tablets per day

- OxyContin® is dosed less frequently than ATC immediate-release opioids
- OxyContin® is **NOT** intended for use as a prn analgesic, or for pain that is mild, or not expected to persist for an extended period of time

IMPORTANT SAFETY INFORMATION:

OxyContin® is an opioid agonist and a Schedule II controlled substance with an abuse liability similar to morphine. Oxycodone can be abused in a manner similar to other opioid agonists, legal or illicit. This should be considered when prescribing or dispensing OxyContin® in situations where the physician or pharmacist is concerned about an increased risk of misuse, abuse, or diversion.

Please read accompanying professional prescribing information.
Please see boxed warning on page 2.



OIG Communications

- We have had the following communications with OIG:
 - Reportable Event - concerning OxyContin visual aid – 12/23/08
 - Exclusion issue – implementation of Udell consulting arrangements – 12/10/08
 - FDA communications about unauthorized blog with Partners Against Pain video - 12/15/08
 - Litigation update – routine report of new litigation -12/22/08
 - Infinity – notification of potential future license rights with Pink Sheet article – 11/21 and 25/08
 - Phone call requested - regarding Infinity deal structure issues; Partners Against Pain video; Reportable Event; and two cases discussed in IRO first review – 1/29/09



Other Significant Matters



These additional matters involved violations of SOPs and policies, but are not “Reportable Events”

- District Manager determined representative (long term employee and multi-time Toppers winner) had falsified call records and expense reports. Representative terminated 12/08/08.
- On 12/12/08, sales representative who had previously been investigated for call note inconsistencies self-reported that she had improperly recorded call notes on at least two physicians. Further investigation disclosed representative not following call note reporting SOP. Representative terminated 01/12/09.
- Corporate Compliance received anonymous Hotline that a representative had been arrested for attempting to use a forged prescription for OxyContin. Representative terminated 01/15/09.



CIA IRO Review



Huron is performing **nine System Reviews** during the Second Reporting Period (ending 7/30/09):

- Provision of Off-Label information about Purdue products (in progress)
- Promotional Monitoring Program (in progress)
- Disciplinary Actions (in progress)
- Sales Force Responses to Questions about Off-Label Uses
- Sales Force Use of Materials
- Interactions of Sales Force, Medical Liaisons, Medical Services
- Material Review
- Sponsorship of Non-Promotional Educational/Informational Activities
- Employee Compensation



CIA IRO Review



- Huron will also perform **two Transaction Reviews** in the Second Reporting Period, similar to reviews done last summer:
 - Focus Inquiry Monitoring
 - Promotion Monitoring Program
- IRO reviews will be completed by August 2009, with Purdue opportunity to review and discuss drafts in advance of submission to OIG as part of Second Annual Report in September

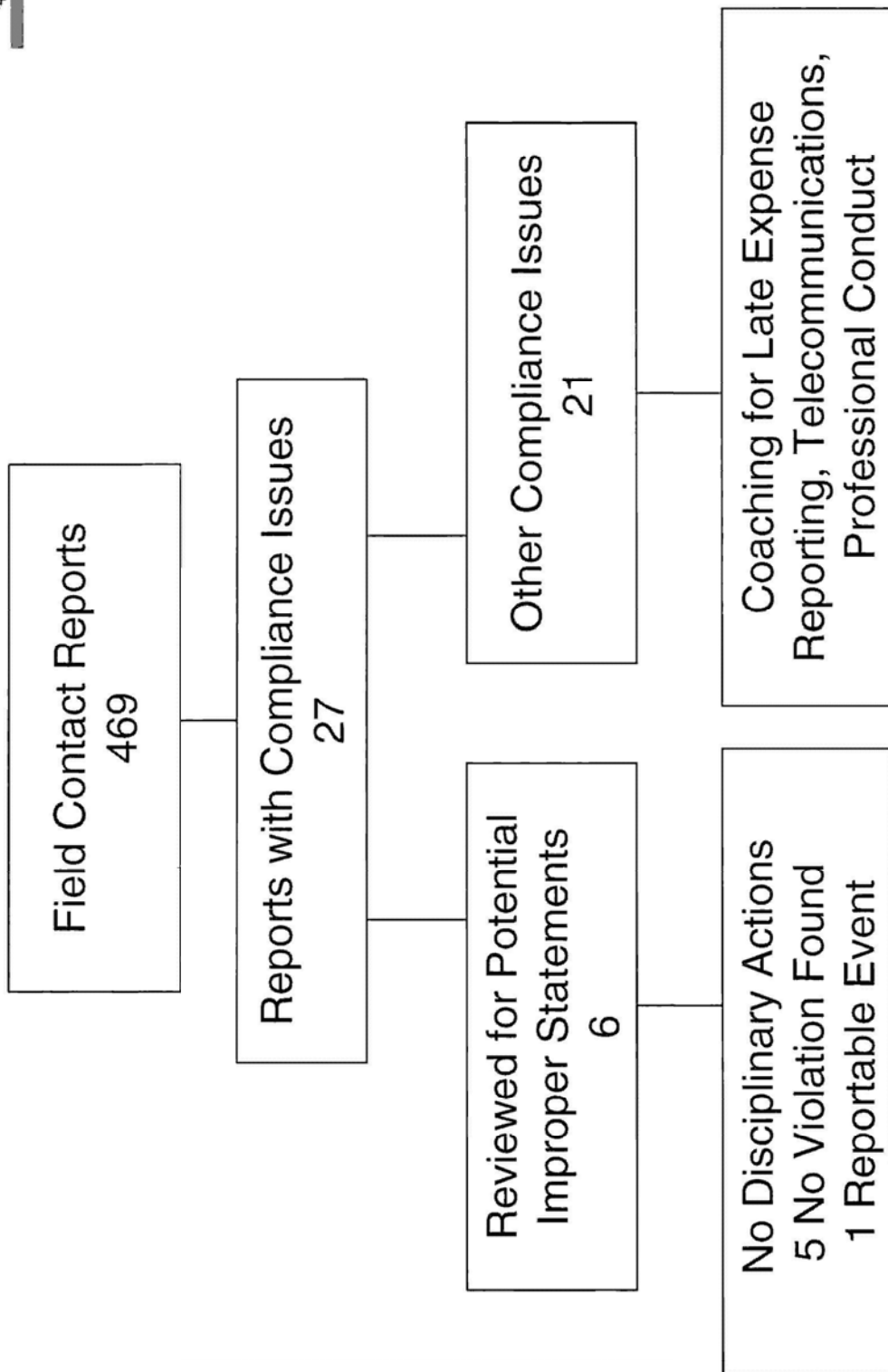


CIA Monitoring

- Focus Inquiry Monitoring
 - 3660 Inquiries (all products)
 - 1167 OxyContin Inquiries
 - 227 Field Sales Related OxyContin Inquiries
 - 98 “Focus Inquiries”
- Promotion Monitoring Program
 - 469 Field Contact Reports in 3Q08
 - 27 with rating of ‘1’ in compliance
 - 6 reviewed for potential improper promotion,
 - » Of which, one a Reportable Event



CIA Field Contact Reports Monitored-Q4



Recent Developments in Compliance



■ Pfizer

- \$2.3 billion (reserve taken – CIA pending) for federal off-label settlement, attributed to off-label promotion of Bextra / Celebrex DTC advertising
- Plus \$900 million resolution of litigation involving non-steroidal anti-inflammatory pain medicines (NSAIDS and COX-2 Inhibitors)
- On top of earlier \$60 million AG settlement



Recent Developments in Compliance



▪ Lilly

- \$1.42 billion settlement to resolve Zyprexa off-label allegations
- \$515 million criminal fine is largest individual corporate criminal fine in history
- On top of earlier \$62 million AG settlement

▪ Since **Cephalon** CIA in October 2008, new CIA provisions (not in Purdue CIA) have become standard, including:

- Board oversight of compliance mandated
- Individual Board and management certifications of compliance
- Disclosure of HCP payments (as per proposed Physicians Sunshine Act)
- Notification letters to HCPs



State/Fed Reporting Update



- Federal legislation – revised Physician Payments Sunshine Act re-introduced in Senate (1/22/09) covers:

- Reporting of individual and total “payments or other transfers of value” to each physician
- Aggregate amount of all payments to all physicians
- Disclosure of Interests held by physicians in manufacturers
- Annual aggregate spend threshold is \$100
- Reporting of covered drug if the Payment is related to its marketing, education, or research
- Preemption provision cut back significantly
- HHS to make reported information publicly available



State Law Reporting Update

- Timely filed 4Q report in Vermont (12/1/08)
- New state requirements pending
 - Awaiting implementing regulations in Massachusetts for new Marketing Code of Conduct
 - Awaiting amendments to current DC Safe Rx Act requirements, which provide for licensing of personnel who interact with HCPs in DC
- Monitoring confirms annual spend limits not exceeded
 - MN (\$50/HCP)
 - CA (\$750/HCP)
- No compliance issues identified



Hotline Calls and Other Inquiries

4Q08



Hotline and Other Inquiries 4Q08

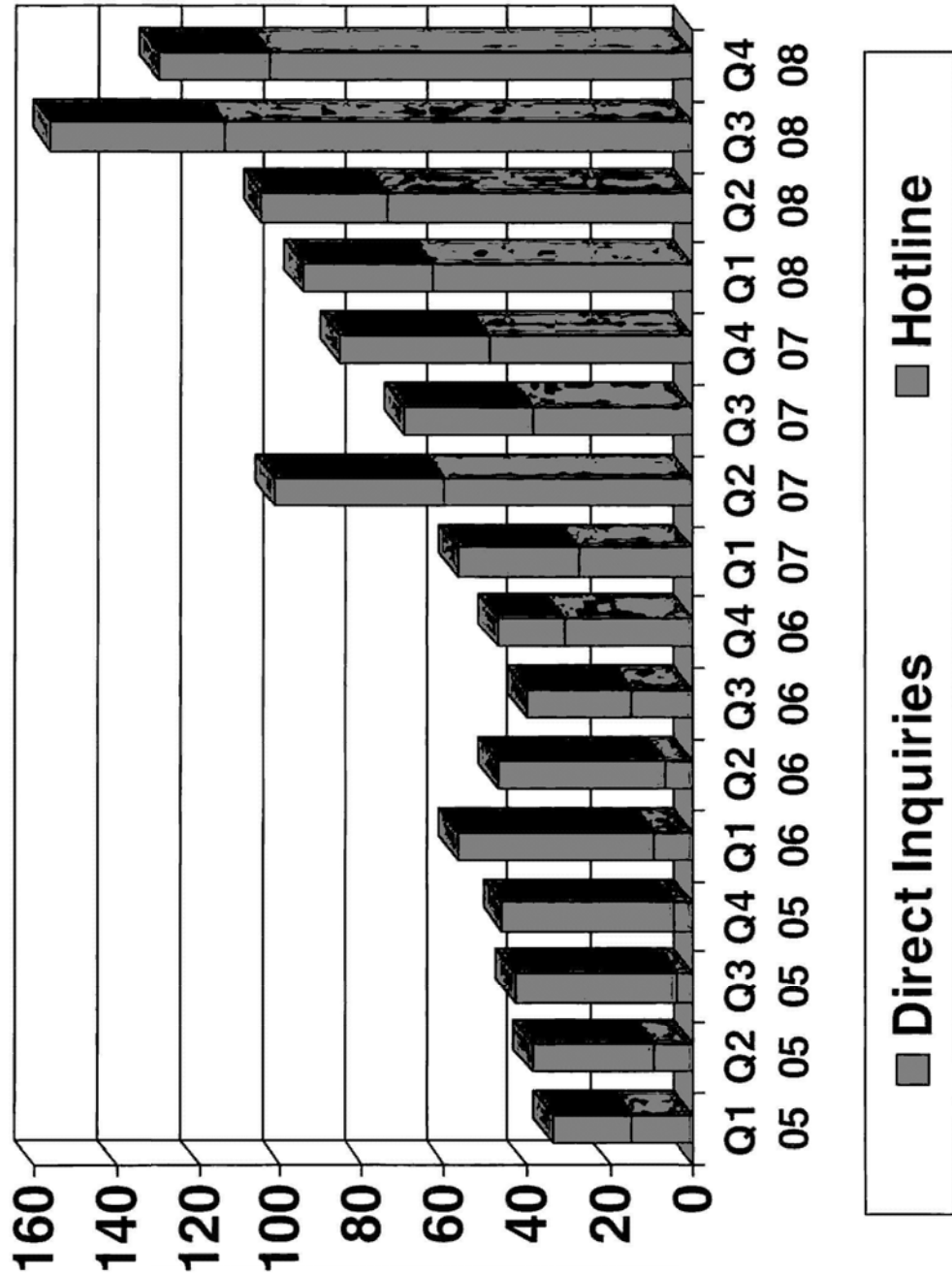


- Investigated 130 matters in 4Q08, including:
 - 45 Institutional Policies questions
 - 18 Company policy inquiries
 - 10 questions related to Company and industry promotion guidelines
 - 15 Medical-related questions
 - 4 significant matters covered previously

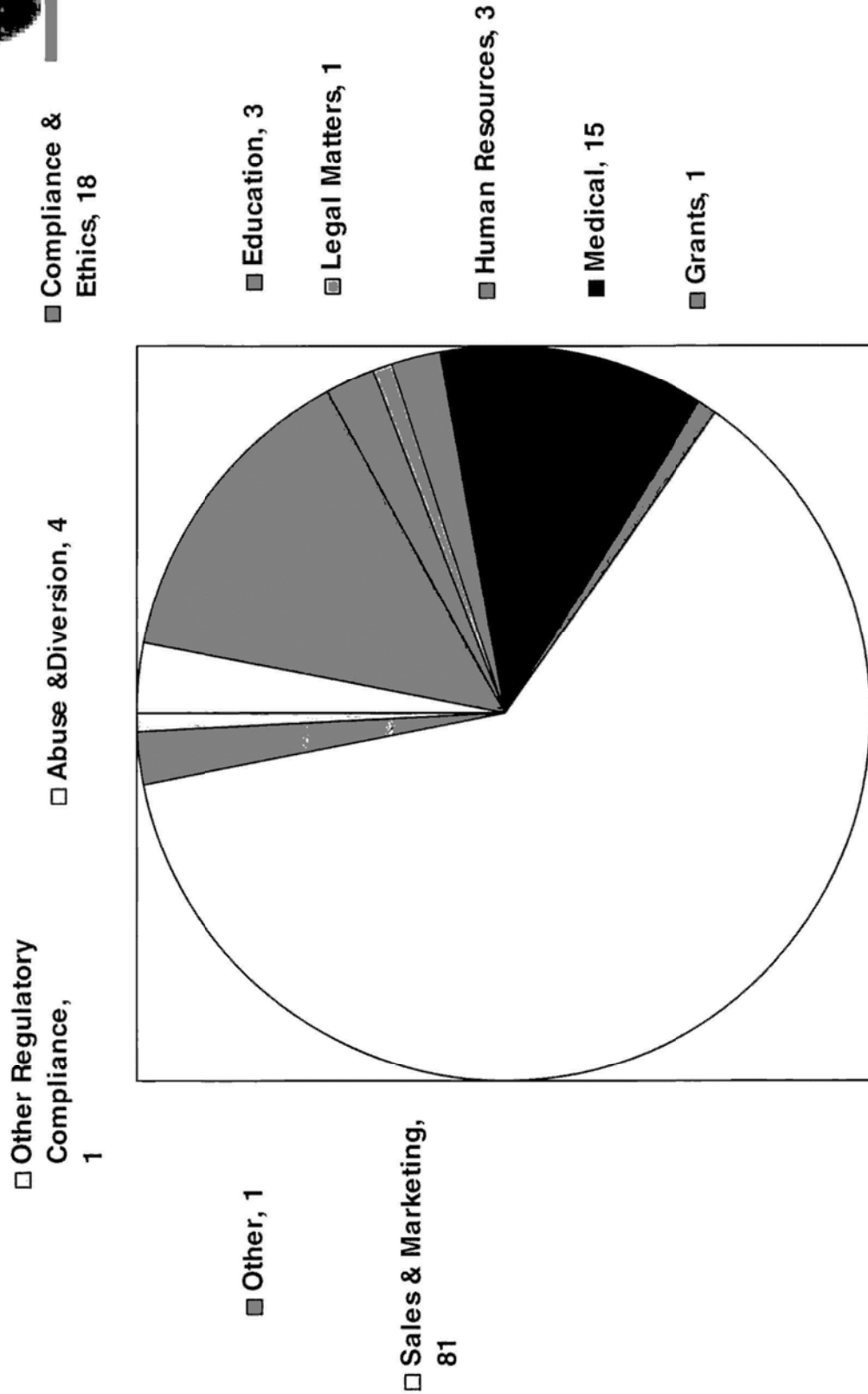




Inquiries by Quarter (1Q05 – 4Q08)



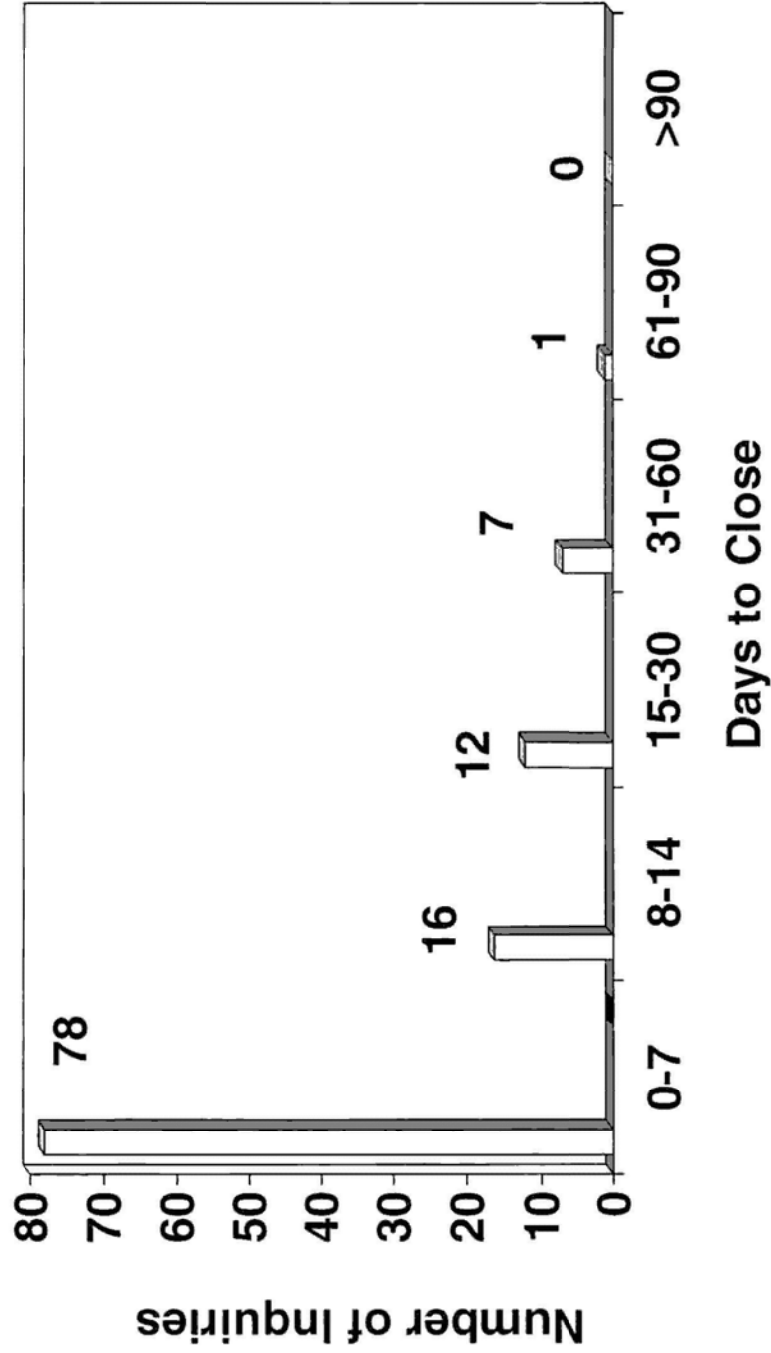
4Q08 Compliance Inquiries





Inquiry Response Time

Days to Close Inquiries 4Q08



National Sales Meeting

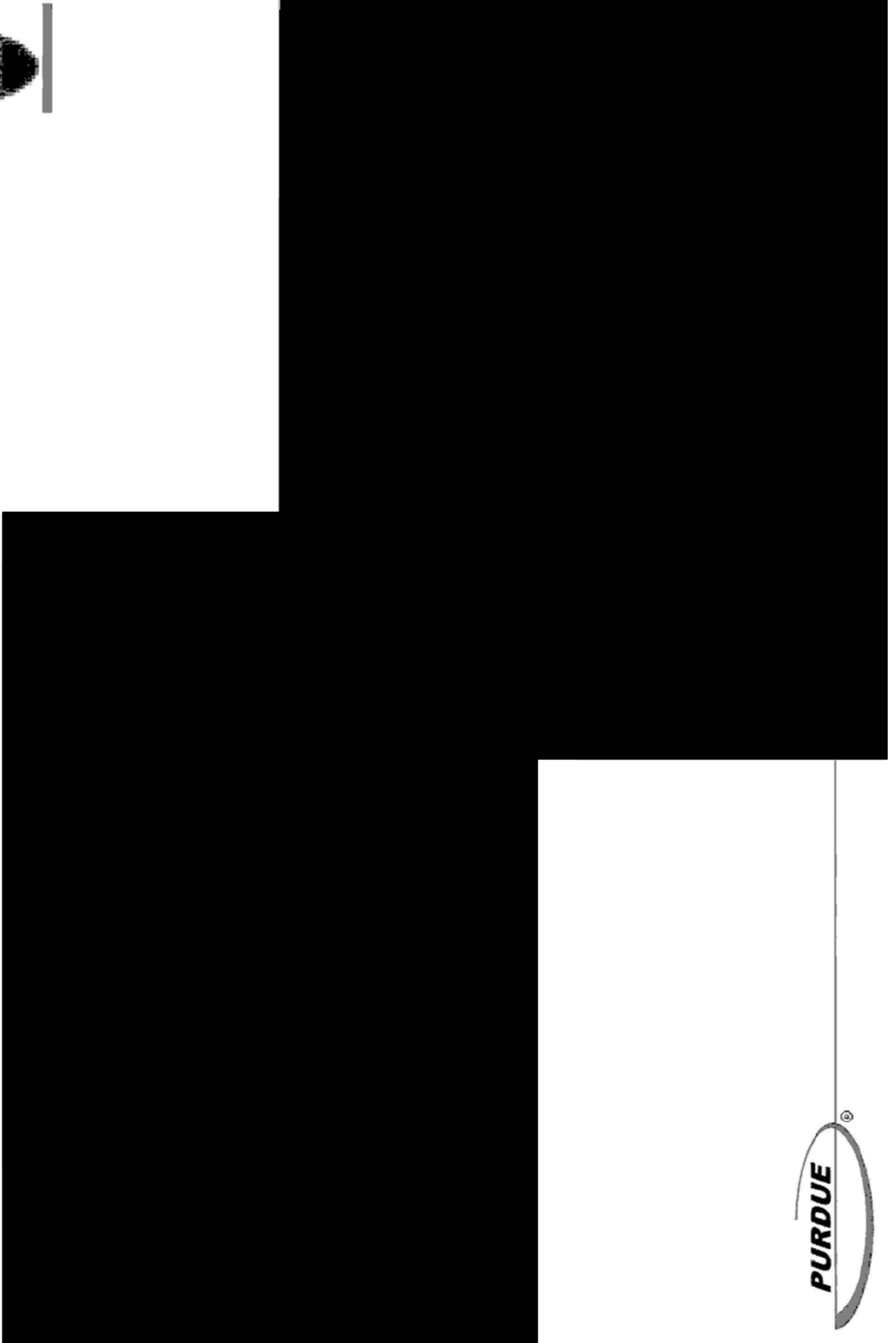


Well-received compliance workshops for all field personnel:

- Focused on Adverse Event, Product Complaint, Report of Concern and Abuse & Diversion Detection (ADD) Program reporting requirements
- Reviewed AG Agreement obligations (especially “Dear HCP Letter” and “ADD Report” requirements)
- Reviewed CIA obligations and overall commitment to compliance with laws, regulations and policies and procedures
- Emphasized appropriate messaging around OxyContin Visual Aid
- “*Be a Compliance Star!*” game
 - Exciting and interactive game that tests compliance knowledge
 - Rewarded strong knowledge of compliance concepts
 - Developed in-house



Be A Compliance Star!



Compliance Results - Purdue Culture Survey



Compliance - All Purdue (94.4 - 3.1 - 2.2 - 0.4)

